

**STATEMENT OF BASIS (AI No. 0071)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0111724 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Gulf South Pipeline Company, LP  
Montpelier Compressor Station  
477 Highway 441  
Holden, Louisiana 70744

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Shontel Stewart

**DATE PREPARED:** March 20, 2006

**1. PERMIT STATUS**

- A. Reason For Permit Action:  
First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.
- B. NPDES permit - LPDES permit effective date: Not applicable  
NPDES permit expiration date: Not applicable
- C. LWDPS permit - (WP4711) LWDPS permit effective date: June 1, 1994  
LWDPS permit expiration date: May 31, 1999
- D. Date Application Received: Original application sent in by Koch Gateway Pipeline June 15, 1999. A duplicate was received from Koch Operating Services August 15, 1999. A revised application was received from Gulf South Pipeline on October 16, 2003.

**2. FACILITY INFORMATION**

**A. FACILITY TYPE/ACTIVITY - natural gas compressor station**

The Gulf South Pipeline Company - Montpelier Compressor Station is an existing natural gas compressor station. The facility is part of a network of pipelines and compressor stations used to transmit natural gas. The facility receives transmissions of natural gas, which it compresses and then transmits back through the pipeline network. Non-process wastewaters are collected in a sump located west of the lube oil storage tank. These wastewaters are routed to the adjacent wastewater treatment system, then into a ditch along the southern property boundary line.

**B. FEE RATE**

- 1. Fee Rating Facility Type: Minor
- 2. Complexity Type: II

3. Wastewater Type: II

4. SIC code: 4922

C. LOCATION - Highway 441, approximately 2 miles south of  
Montpelier in Holden, Louisiana, in Saint Helena Parish

Latitude 30°39'26", Longitude 90°39'37" (Front Gate)

### 3. OUTFALL INFORMATION

#### Outfall 002

**Discharge Type:** equipment washing wastewater, groundwater  
infiltrate, and air condensate

**Treatment:** Wastewaters are collected in a below-grade concrete sump  
and pumped to an oil/water tank. The oil is skimmed from the  
surface and pumped through a filter and cyclone. The recovered oil  
is transferred into the used oil tank and shipped off-site for  
recycling. The lower aqueous layer is pumped through a membrane  
filter.

**Location:** wastewaters are collected in a sump located west of the  
lube oil storage tank. (Latitude 30°39'17", Longitude 90°39'44")

**Flow:** Intermittent; 1410 gpd.

**Discharge Route:** Via ditch along the southern property boundary  
line to Bear Creek and thence into Tickfaw River

### 4. RECEIVING WATERS

STREAM - Tickfaw River via Bear Creek

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040501

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. outstanding natural resource waters

### 5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

### 6. COMPLIANCE HISTORY/COMMENTS

#### A. Compliance History

LDEQ records were reviewed for the period from January 2003 through  
January 2005. No records of enforcement actions were found.

#### B. DMR Review/Excursions

Based on a review of DMR data for the period from January 2001 through March 2004 (with the second quarter of 2001 missing for Outfall 001, and the first quarter of 2003 missing for Outfall 101) the facility has had the following excursions:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
09/01	COD	001	129 mg/L	125 mg/L (max)
09/02	COD	001	146 mg/L	125 mg/L (max)
09/01	pH	001	5.7 s.u.	6.0 s.u. (min)
05/02	pH	001	5.7 s.u.	6.0 s.u. (min)
07/02	pH	001	5.8 s.u.	6.0 s.u. (min)
09/02	pH	001	5.3 s.u.	6.0 s.u. (min)
11/02	pH	001	5.5 s.u.	6.0 s.u. (min)
04/03	pH	001	5.8 s.u.	6.0 s.u. (min)
07/03	pH	001	5.6 s.u.	6.0 s.u. (min)
08/03	pH	001	5.2 s.u.	6.0 s.u. (min)
02/04	pH	001	5.4 s.u.	6.0 s.u. (min)

\*The excursions occurred at Outfall 001 which is no longer in the permit. Additionally, the pH excursions at this outfall are due to naturally occurring acidic soils. This has been discussed and duly noted between Gulf South Pipeline Company and LDEQ.

#### 7. Changes from Previous Permit

The following changes have been made from the 1994 LWDPs permit:

- A. Ownership/Operator change from Koch Gateway Pipeline to Koch Operating Services then to Gulf South Pipeline
- B. Outfall 001: This outfall has been deleted from the permit. This Office has confirmed through its records that the facility is stormwater exempt in accordance with Title 33:IX.2511.A.1. Additionally, only in the case that the facility has a significant rainfall event, will Outfall 002 (formerly Outfall 101) reach Outfall 001.
- C. Outfall 101: Internal Outfall 101 was changed to external Outfall 002. Cooling tower blowdown was taken out of the outfall description because it is no longer discharged. Groundwater infiltrate and air condensate have been added to the outfall description. Additionally, limits have been established for air condensate and revised for equipment washwaters.

D.A Stormwater Pollution Prevention Plan (SWP3) requirement is added to the draft permit in accordance with current DEQ stormwater policy, and replaces the BMP Plan requirements in the 1994 LWDPs permit.

#### **8. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 040501 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as a threatened species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 21, 2005 from Russell Watson (FWS) to Karen Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

#### **9. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

#### **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may

submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

a local newspaper of general circulation and

Office of Environmental Services Public Notice Mailing List

## 12. 303(d)/TMDL WATERBODIES

Subsegment 040501, Tickfaw River - From Mississippi State Line to La. Hwy. 42 (Scenic), is listed on LDEQ's Final 2004 303(d) list as impaired for mercury, pathogen indicators, and TDS. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Ponchartrain Basin, those suspected causes of impairment which are not directly attributed to natural gas compressor station point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

### Mercury

The coastal TMDL for mercury modeled the Mississippi River as a point source load. Mercury will be addressed by EPA when they complete the TMDL due by March 31, 2011.

### Pathogen Indicators

The discharge of pathogen indicators at levels above state water quality standards is attributed to the discharge of improperly treated sanitary wastewater. Because the discharge from this natural gas compressor station does not include a sanitary wastewater stream, there exists no reasonable potential for the discharge of pathogens at levels which would cause or contribute to an excursion above state water quality standards for pathogen indicators.

TDS

The discharge of totally dissolved solids (TDS) at levels above the state water quality standards is attributed to drainage, filling, and loss of wetlands. Based on an evaluation of the effluent discharges, the facility does have the potential to contribute to TDS. Therefore, effluent limitations have been established in the draft LPDES permit.

13. Stormwater Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for stormwater contamination from processes including loading, unloading, and area wash down.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II, Paragraph J of the Draft Permit).

**Rationale for Gulf South Pipeline Company, LP**

1. **Internal Outfall 002:** Equipment wash wastewaters, groundwater infiltrate, and air condensate (estimated flow is 1,410 gpd)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg:Daily Max (mg/L)	
Flow (MGD)	Report:Report	
TSS	---:45	LAG480000 permit; Natural Gas Processing Plants Rationale(BPJ)
TOC	---:50	Natural Gas Processing Plants Rationale (BPJ)
COD	---:300	Previous permit
Oil & Grease	---:15	Previous permit
pH	6 su - 9 s.u.	Previous permit
Visible sheen	No Presence	LAG480000 permit (BPJ)
Soaps and/or Detergents	report:---	LAG480000 permit (BPJ)

**Treatment:** Wastewaters are collected in a below-grade concrete sump and pumped to an oil/water tank. The oil is skimmed from the surface and pumped through a filter and cyclone. The recovered oil is transferred into the used oil tank and shipped off-site for recycling. The lower aqueous layer is pumped through a membrane filter.

**Monitoring Frequency:** Flow, TOC, oil and grease, COD, TSS, pH, visible sheen, and soaps and detergents shall be monitored once per month.

**Limits Justification:** TOC, oil and grease, COD, and pH limits are BPJ based on the previous permit, existing permits for similar outfalls, and the General Rationale for Natural Gas Processing Plants and Compressor Stations (revised January 7, 2004). TSS, visible sheen, and soaps and detergents are BPJ based on General Rationale for Natural Gas Processing Plants and Compressor Stations and LAG480000 Light Commercial general permit.